

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

KEVIN PINE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

A PLACE FOR MOM, INC., a Delaware
corporation,

Defendant.

No. 17-cv-1826

JOINT STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
DEADLINE

**NOTE ON MOTION CALENDAR:
May 22, 2019**

STIPULATION & [PROPOSED] ORDER TO EXTEND
DEADLINES

Case No. C17-01826 TSZ

144469383.1

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1 Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Kevin Pine (“Plaintiff”) and
2 Defendant A Place for Mom, Inc. (“Defendant”) (collectively, the “Parties”), by their respective
3 attorneys, hereby submit this Joint Stipulated Motion to extend case deadlines based on the
4 following facts:

5 WHEREAS, the Parties submitted a proposed pre-trial briefing schedule on May 6, 2019
6 (Dkt. 125);

7 WHEREAS, the Court issued a Minute Order on May 13, 2019 setting the trial date and
8 related deadlines (Dkt. 126);

9 WHEREAS, motions related to class certification are due June 20, 2019 (Dkt. 126);

10 WHEREAS, oppositions to motions related to class certification are due July 8, 2019
11 (Dkt. 126; LCR 7(d)(3));

12 WHEREAS, replies in support of motions related to class certification are due July 12,
13 2019 (Dkt. 126; LCR 7(d)(3));

14 WHEREAS, lead defense counsel, James Snell, has family travel plans out of the country
15 from June 15 through July 2, 2019 to celebrate a milestone family event (graduation), and will
16 also be traveling July 5-19, 2019;

17 WHEREAS, Defendant’s General Counsel, Camille Cleveland, is out of the country from
18 June 3-19;

19 WHEREAS, these dates were discussed by the Parties and considered in the proposed
20 scheduling order;

21 WHEREAS, the Parties respectfully request a modest continuance of the class
22 certification briefs to accommodate the above travel;

23 WHEREAS, the Parties agree to extend the deadline to file a class certification motion
24 until July 11, 2019;

25 WHEREAS, the Parties agree to extend Defendant’s opposition deadline until July 29,
26 2019;

WHEREAS, the Parties agree to extend Plaintiff's reply deadline until August 5, 2019;

WHEREAS, the Parties agree that the revised noting date of the class certification motion would be extended until August 5, 2019;

NOW THEREFORE, Plaintiff and Defendant hereby stipulate and respectfully request, subject to Court approval, that:

The Court extend the dates as set forth below:

<i>Item</i>	<i>Current Date</i>	<i>Proposed Date</i>
Any motions related to class certification must be filed by	June 20, 2019	July 11, 2019
Any response to motions related to class certification must be filed by	July 8, 2019 (Fourth-Friday motion pursuant to Civil L.R. 7(d)(3))	July 29, 2019
Any reply related to class certification must be filed by	July 12, 2019 (Fourth-Friday motion pursuant to Civil L.R. 7(d)(3))	August 5, 2019
Noting date for motions relating to class certification	July 12, 2019 (Fourth-Friday motion pursuant to Civil L.R. 7(d)(3))	August 5, 2019

It Is So Stipulated Through Counsel of Record This 22nd Day of May, 2019.

A PLACE FOR MOM, INC.

KEVIN PINE

By: /s/ James F. Williams

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CERTIFICATE OF SERVICE

I certify that on May 22, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED: May 22, 2019

By: /s/ James F. Williams
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